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February 21, 2025

Via ECF & electronic mail

The Honorable Wendy Beetlestone
United States District Court
Eastern District of Pennsylvania
James A. Byrne U.S. Courthouse
601 Market Street
Philadelphia, Pennsylvania 19106-1797

**Re: *Commonwealth of Pennsylvania, et al. v. Donald J. Trump, et al.*,
Case No. 2:17-cv-04540**

Dear Judge Beetlestone:

Plaintiffs Commonwealth of Pennsylvania and State of New Jersey respectfully request an extension on the motion for summary judgment briefing deadlines. Per the Court's policies and procedures, Plaintiffs have conferred with counsel for Defendants, and this request is unopposed and by consent of all parties. Plaintiffs request this extension due to significant and time-sensitive deadlines in other matters, including litigation involving the United States. Additionally, one of the attorneys for Plaintiff New Jersey has been experiencing a family medical emergency that has limited their availability.

As discussed, Plaintiffs have conferred with counsel for Defendants, and the parties have jointly agreed to the following extended briefing schedule:

- Plaintiffs' summary judgment motion: **March 11, 2025**
- Defendants' opposition and cross-motions for summary judgment: **April 18, 2025**
- Plaintiffs' opposition to cross-motions and reply brief: **May 19, 2025**
- Defendants' cross-motions reply brief: **July 3, 2025**



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Respectfully submitted,

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/s/ Joshua P. Bohn

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